Kevin R. Anderson (4786) Kellie K. Nielsen (11416) Tami Gadd-Willardson (12517) Laura J. Jones (13997) OFFICE CHAPTER 13 TRUSTEE 405 South Main St., Suite 600 Salt Lake City, UT 84111

Telephone: (801) 596-2884 Facsimile: (801) 596-2898

Email: kratrusteemail@ch13kra.com

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH CENTRAL DIVISION

In re:

SHAHIN MOHAMMAD REZA
Debtor.

Case No. 12-28944
Chapter 13
Judge R. Kimball Mosier
(Confirmation Hearing: 09/25/12 at 10:00 AM)

TRUSTEE'S OBJECTION TO CONFIRMATION

This is a below-median case and the Debtor's plan provides for payments of \$123.00 to return \$1,415.20 to nonpriority unsecured creditors. Kevin R. Anderson, Chapter 13 Trustee, hereby objects to confirmation of the Debtor's plan and in support thereof represents as follows:

- 1. The Debtor(s) failed to provide at the 341 Meeting a copy of the 2011 county property tax assessment for the real property listed on Schedule A (see Local Rule 2083-1(c)).
- 2. The Debtor should file an affidavit regarding insufficient income for all unfiled tax returns.
- 3. The Trustee is unable to verify the following income listed on the Schedule I: food stamps.

Case 12-28944 Doc 13 Filed 08/22/12 Entered 08/22/12 11:57:44 Desc Page 2

4. Schedule I lists a voluntary, monthly contribution from a third party. The

Debtor(s) should file with the Court an affidavit signed by such third party stating that the third

party has the means and the intent to make such contribution on a monthly basis during the term

of the Debtor(s)' Chapter 13 plan.

5. The names on the Certificates of Credit Counseling do not match the names on

the Chapter 13 petition. The Debtor(s) should amend the petition or obtain an amended

Certificate of Credit Counseling to resolve this issue.

6. Schedule B fails to fully disclose and value the following property of the estate:

loan to Broadway Auto of \$119,000 (see case number 12-26262).

7. It appears that the gross income listed on Form 22C does not include all of the

Debtor(s)' food stamp income received during the six-month "look-back" period of § 101(10A).

8. The Debtor(s) have failed to list on Schedule J a monthly expense of \$199 for a

contribution to the morrgage.

THEREFORE, the Trustee objects to confirmation of the Debtor's plan. If the Debtor is

unable to resolve the Trustee's objection by the confirmation hearing, the Trustee will move to

dismiss or convert this case.

DATED: August 22, 2012.

Attorney for Trustee

2

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 22, 2012, a true and correct copy of the foregoing paper was served electronically via CM/ECF to the persons listed below.

LINDA D. SMITH, ESQ. ECF NOTIFICATION

The undersigned hereby certifies that on August 22, 2012, a true and correct copy of the foregoing paper was addressed to the following persons and deposited in the U.S. Mail, first-class postage prepaid.

SHAHIN MOHAMMAD REZA 5809 S. WATERBURY DR. SALT LAKE CITY, UT 84121

Office Chapter 13 Trustee